

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 22-cv-22897-Williams

Ryan Bowers,

Plaintiff,

v.

Trading Card World LLC, at al.

Defendants.

_____ /

**DECLARATION OF ATTORNEY'S FEES IN SUPPORT OF
MOTION FOR FINAL DEFAULT JUDGMENT**

1. My name is R. Edward Rosenberg and I am the attorney of record for Plaintiff.
2. This declaration is based on my personal knowledge of the attorneys' fees and costs charged and collected, or to be charged and collected, from Plaintiff, and upon my review of the books and records of Sorondo Rosenberg Legal, P.A., made in the ordinary course of business and held under my supervision and control.
3. I am a partner and shareholder of Sorondo Rosenberg Legal and have been a licensed and practicing attorney since 2010. I practice primarily in Miami-Dade and Broward Counties but also throughout the state of Florida. I graduated from Florida International University School of Law in 2009. I was admitted to the bar of the state of New Jersey in 2010 and the state of Florida in 2011 with other admissions to the Southern and Middle Districts of Florida, District of New Jersey, District of Colorado, Southern District of Texas, and Eastern District of Michigan. I am admitted to the United States Court of Appeals for the 11th Circuit where I recently had a Summary Judgment order upheld in a published opinion. My firms and I have been class

counsel for several cases throughout the state of Florida and other locations. I became a partner at Sorondo Rosenberg Legal in 2016. Previously, I had been an associate at Feldman Morgado PA from 2012 through 2016. The entirety of my time at both firms has been in practice of employment law and litigation where I have been lead counsel for hundreds of employment law related cases. I have spoken at various panels for my employment law expertise.

A. ATTORNEY'S FEES

4. Under my agreement with my client, he is obligated to pay me \$400.00 per hour multiplied by the hours worked plus any costs for court filing and proceedings, copies, and postage etc. All my Plaintiff's cases are taken on pure contingency including all out of pocket costs and expenses. Thus when I spend time on contingency matters I do so at significant risk. My hourly rate has been \$400 per hour for several years.

5. In the handling of this matter, I have expended 11 hours of time working on the Plaintiff's case, including: reviewing the facts with Plaintiff, advising him in attempting to obtain his unpaid wages without the need for litigation, drafting and filing the complaint and accompanying documents, reviewing court documents, drafting the statement of claim, and preparing the necessary motions and documents to secure a judgment in this action. No work on this case has been performed by any paralegals or assistants as the firm only has one other employee, my partner. Based on 11 hours at the rate of \$400.00 per hour, the total amount of attorneys' fees is \$4,400.00.¹

6. Based on the actual attorney's fees, Plaintiff requests a final judgment for attorney's fees in the amount of \$4,400.00.

¹ Please see the attached billing records

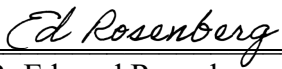
B. COSTS

7. In handling this matter, the costs include the following: (a) filing fee for action in the amount of \$402.00; (b) service fee for filing action of \$100.00. Based on the foregoing, the total amounts of costs currently are \$502.00.²

8. Plaintiffs request a final judgment for costs in the amount of \$502.00.

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING DECLARATION AND THAT THE FACTS STATED IN IT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Date: November 22, 2022.



R. Edward Rosenberg, Esq.

² Please see attached receipts

Date	Description	Hours
18-Aug-22	Initial Consultation with client	0.5
25-Aug-22	Reviewing text messages between client and employer	0.2
8-Sep-22	Reviewing more text messages; explaining process to client	0.4
11-Sep-22	Drafting Complaint	2.1
12-Sep	Finishing complaint and reviewing with client; filing complaint	2.2
14-Sep-22	Sending Complaint for service	0.1
15-Sep-22	Reviewing Court Order	0.2
26-Sep-22	Statement of Claim	0.3
6-Oct-22	Filing Return of Service and Motion for Clerk's Default Ucros	0.2
12-Oct-22	Filing Return of Service and Motion for Clerk's Default Trading Card World	0.2
24-Oct-22	Reviewing Order on Default Procedure	0.1
25-Oct-22	Explaining Default Procedure to client	0.2
21-Nov-22	Motion for Default Judgment	2.1
22-Nov-22	Finishing Motion for Default Judgment	2.2
	Total Hours	11

DLE Process Servers, Inc
 936 Sw 1st Avenue
 #261
 Miami, FL 33130
 Phone: (786) 220-9705
 Fax: (786) 363-8808
 Tax ID 300501491

INVOICE

Invoice #DLE-2022038598
 9/20/2022



Sorondo Rosenberg Legal Pa
 1825 Ponce De Leon Blvd
 #329
 Coral Gables, FL 33134

Your Contact: R. Edward Rosenberg
Case Number: 1:22-CV-22897-KMW

Plaintiff:
Ryan Bowers

Defendant:
Trading Card World, LLC and Adrianna Ucros

Received: 9/13/2022 Served: 9/19/2022 11:59 am LLC SUB SERVE - 3 TABS
 To be served on: Trading Card World, Llc c/o: United States Corporation Agents, Inc.

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Summons - Out Of Tri-County	1.00	60.00	60.00
TOTAL CHARGED:			\$60.00

BALANCE DUE:	\$60.00
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Please include the invoice number on your check.
 Payment is due 30 days after invoiced. A late fee of \$5.00 will apply to each unpaid invoice after 60 days. Any invoice over 120 days past due may be subject to collection. Attorney/Client is responsible for all costs to include attorney's fees for invoices sent to collections.

DLE Process Servers, Inc
 936 Sw 1st Avenue
 #261
 Miami, FL 33130
 Phone: (786) 220-9705
 Fax: (786) 363-8808
 Tax ID 300501491

INVOICE

Invoice #DLE-2022038599
 9/21/2022

Original Date: 9/16/2022



Sorondo Rosenberg Legal Pa
 1825 Ponce De Leon Blvd
 #329
 Coral Gables, FL 33134

Your Contact: R. Edward Rosenberg
Case Number: 1:22-CV-22897-KMW

Plaintiff:
Ryan Bowers

Defendant:
Trading Card World, LLC and Adrianna Ucros

Received: 9/12/2022 Served: 9/14/2022 1:45 pm SUBSTITUTE - RESIDENTIAL
 To be served on: Adrianna Ucros

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Summons - Miami-Dade	1.00	40.00	40.00
TOTAL CHARGED:			\$40.00
BALANCE DUE:			\$40.00

Please include the invoice number on your check.

Payment is due 30 days after invoiced. A late fee of \$5.00 will apply to each unpaid invoice after 60 days. Any invoice over 120 days past due may be subject to collection. Attorney/Client is responsible for all costs to include attorney's fees for invoices sent to collections.